

# Wyoming Department of Agriculture

2219 Carey Avenue, Cheyenne, WY 82002 • Phone 307-777-7321 • Fax 307-777-6593 • Website: wyagric.state.wy.us • E-mail: wda1@state.wy.us

*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life*



Wyoming Department of Agriculture

April 2, 2009

Jessica Pettee, Rangeland Management Specialist  
Pinedale Field Office  
Bureau of Land Management  
P.O. Box 768  
Pinedale, WY 82941

Dear Jessica Pettee:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice for the Ryegrass Area Grazing Allotments Grazing Plan, Associated Range Improvement Projects, and Permit Renewal Environmental Assessment consisting of three livestock grazing allotments located within the Pinedale Field Office (FO) of the Bureau of Land Management (BLM).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

The Environmental Assessment (EA) is proposing to analyze three alternatives; 1) Proposed Action Alternative: would consider new management objectives and action items to assist in meeting the objectives set for the project area, 2) No Action Alternative: would continue the current management practices associated with the existing livestock grazing allotments, and 3) No Grazing Alternative: where grazing would no longer occur in the project area. Changes to any of the allotments will impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, in and near the project area.

The WDA commends the efforts of the Pinedale FO in working cooperatively with the permittee in developing management objectives for the Ryegrass Grazing Area Allotments. The WDA supports the Pinedale FO efforts in analyzing a full range of alternatives, but strongly oppose the No Grazing Alternative. Livestock grazing is an approved activity in the Pinedale Resource Management Plan (RMP) and Record of Decision (ROD) (November, 2008). The ROD states a management goal in the RMP is, "Maintain and/or enhance livestock grazing opportunities and rangeland health," with an approved action under this goal stating, "Forage will be made available for livestock grazing use." With this in mind the WDA strongly believes the No Grazing Alternative should not be considered in the analysis for this EA. In addition, management prescriptions in the analysis must reflect multiple use resource principles.

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Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM administered lands. WDA particularly encourages the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing, be specifically noted in the environmental document. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and domestic animals..." Many in the public are unaware of this Congressional policy and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource, and the State of Wyoming.

The WDA supports the Proposed Action Alternative. This alternative provides a rotational grazing system allowing a season of rest for a different pasture each year. The management objective includes several objectives relating to wildlife and wildlife habitats. The current Scoping Notice in the management objectives discusses such things as maintaining or improving conditions or habitats, promoting recruitment of sagebrush for wildlife, and allocating grass forage for sage grouse, but does not mention how these will be evaluated or by what methods. We would suggest including a detailed management objective regarding monitoring. The monitoring objective should include a schedule of the evaluation timeline, monitoring to be completed (vegetation, ungulate, sage grouse, etc.), methods used, and an assessment of the progress towards accomplishing the management objectives for the allotments.

The Proposed Action Alternative provides the permittee with the flexibility to better manage their livestock operations in order to meet the RMP's goals and objectives. The alternative provides an avenue to adjust animal numbers of use and the ability to adjust timing of stocking to better match forage availability, while identifying and implementing range improvement projects. This alternative greatly improves the BLM's and permittees' ability to manage the resource and operations.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. The Pinedale FO needs to include impacts to this economic activity in the analysis. We urge Pinedale FO officials coordinate with the Department of Agriculture and Applied Economics located in the University of Wyoming - College of Agriculture, who conducted several studies showing federal policies do impact agriculture throughout the state. The studies include the importance of Animal Unit Months, the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The No Grazing Alternative would directly affect the continuation of livestock grazing and other agricultural operations within the planning area. We insist the economic impacts created by the No Grazing Alternative be included in the analysis.



In addition to the economic impacts, livestock grazing represents irreplaceable environmental and social values. Livestock have grazed on these allotments for over 100 years. These values and traditions contribute valuable and irreplaceable wildlife habitat, open spaces, rangeland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Losses of these essential environmental, historic, and social values of livestock grazing should be included by the Pinedale FO in the scope of the analysis.

The WDA appreciates the efforts of the Pinedale FO staff in working with the permittees, and strongly urge this practice continue with all permittees located within the three allotments. We encourage Pinedale FO officials work with all grazing permittees and agriculture producers affected by this plan to learn of their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge that should be utilized to its full advantage. Producers are particularly aware of how impacts will affect rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of rangelands in the project area and can offer recommendations which are both environmentally and economically sound. Thus, we strongly recommend Pinedale FO officials aggressively address the concerns and recommendations of these stewards throughout the planning process. This includes ensuring grazing permittees directly affected by this plan receive all notices regarding this renewal.

Livestock grazing is an important resource management tool used to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The EA and analysis needs to include (1) the positive effects livestock grazing has upon the environment, and (2) how livestock grazing assists in achieving environmental objectives and objectives set forth in the Pinedale RMP.

We must remember livestock grazing is an approved activity in the existing Pinedale RMP. Pinedale FO decisions made in the EA should be based on a case-by-case basis and supported with peer-reviewed science. The analysis needs to identify the science supporting the decisions and discussions and be based on long-term monitoring data and not based on single incidents, isolated situations, or political whims.

We strongly support the continuance of commercial livestock grazing on the Ryegrass Area Grazing Allotments. We appreciate the opportunity to comment on the Scoping Notice for the proposed action. We encourage continued attention to our concerns, and we look forward to hearing about and being involved in future proposed actions and decisions.

Pinedale Field Office  
Bureau of Land Management  
Ryegrass Area Grazing Allotment  
Environmental Assessment  
04/02/2009  
Page 4

In addition, the WDA believes the Scoping Notice for the proposed EA is put together extremely well and is extremely thorough. The effort by the BLM to produce a quality document is appreciated.

Sincerely,



John Etchepare  
Director

JE/cw

CC: Governor's Planning Office  
Wyoming Game and Fish Department  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Farm Bureau Federation  
Wyoming Association of Conservation Districts  
State Grazing Board